

Mr. Boyd,

My name is Scott Collinge, and I am providing comment on the notice below identifying regulations found by Honeywell Engines, Systems & Services, a business unit of Honeywell International Inc. to be "burdensome, unnecessary or impose needless economic costs."

Below please find our top 3 identified priorities for removal from 14 CFR.

Priority 1):

FAA Regulation: 14CFR21.325(b)(3)

"(b) Products which may be approved. Export airworthiness approvals are issued for--

3) Class II and III products that are manufactured and located in the United States.

Reason: Unnecessary and costly - Does not support a global manufacturing environment. It is the PAH responsibility to ensure that class II and III products conform to approved design, regardless of where it is produced globally.

Priority 2:

FAA Regulation: 14CFR21.147

"After the issue of a production certificate, each change to the quality control system is subject to review by the Administrator. The holder of a production certificate shall immediately notify the Administrator, in writing of any change that may affect the inspection, conformity, or airworthiness of the product."

Reason: Burdensome and unnecessary - Applies administrative burden to both

FAA and PAH in providing all Quality System revisions for review. Subject to interpretation - No value added.

Priority 3:

FAA Regulation: 14CFR145.153(b)(1)

(b) Each supervisor must--

(1) If employed by a repair station located inside the United States, be certificated under part 65.

Reason: Burdensome, unnecessary and costly - Supervisory (management) personnel are not performing a maintenance

function, and as such, should not be required to be Part 65 certificated. It is proposed that the FAA allow the use of a technical lead to ensure that employees performing the work are capable.

Regards,

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